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December 20, 2022

Via ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Dedra De La Rosa v. Cynthia Lam and Frank Lam, as Tenants by the Entireties, and Necessary Clothing, Inc.; Docket No. 1:19-cv-10317 (ER)(JLC)

Dear Judge Ramos:

We represent the plaintiff in the above-entitled action. We write on behalf of all the parties to advise the Court that the parties have been engaged in settlement discussions and have reached an agreement in principle on the terms of injunctive relief. The parties will now document the terms of injunctive relief in a stipulation and proposed Order which they will submit to the Court by February 17, 2023. Given the foregoing, the parties respectfully seek a mediation referral and extension of time to submit trial filings from the Court as detailed below.

The parties respectfully request that the Court refer them to this District's mediation program to assist them in settling the remaining claims in this case. As pre-trial filings and a trial will be unnecessary if the parties settle all the claims in this action, the parties respectfully ask the Court to adjourn the forthcoming pretrial deadlines to submit their joint pre-trial filings, the pretrial conference, and trial date to a date after they attend mediation. The parties propose that they submit a joint status letter to the Court within 5 days after they mediate the matter to apprise on whether the parties have settled. To the extent the parties have not settled, the parties respectfully ask the Court to set a schedule for pre-trial filings and trial at that time.

This is the first request to adjourn the pretrial filings and trial and is a joint request of all parties. The currently scheduled dates are listed below. As new dates will depend on the outcome of mediation, the parties have not proposed new dates for these items.

ITEM	DATE
Final Pretrial Conference	January 19, 2023 at 2 p.m.
Jury Trial	January 23, 2023 at 9:30 a.m.
Motions in limine due	December 20, 2022
Responses to Motions in limine due	January 5, 2023.
Proposed Voir Dire and Jury Charges due	December 20, 2022

Responses to Proposed Voir Dire and Jury Charges due	January 5, 2023
Joint Pretrial Order due	December 20, 2022

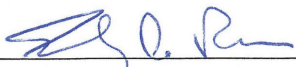
Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Glen H. Parker, Esq.

The pretrial schedule and trial are adjourned. The Court will issue a mediation referral order.
SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 12/23/222

New York, New York